

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
 - POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Filing at a Glance

Company: MVP Health Plan, Inc.
 Product Name: VT LG HMO 2021 POS Riders
 State: VermontGMCB
 TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)
 Sub-TOI: HOrg02G.003B Large Group Only - POS
 Filing Type: GMCB Rate
 Date Submitted: 02/12/2021
 SERFF Tr Num: MVPH-132718695
 SERFF Status: Pending State Action
 State Tr Num:
 State Status:
 Co Tr Num:

 Effective: 07/01/2021
 Date Requested:
 Author(s): Matt Lombardo, Christopher Pontiff, Julia Dorr
 Reviewer(s): Thomas Crompton (primary), David Dillon, Jacqueline Lee, Christina McLaughlin, Michael Barber, Laura Beliveau

 Disposition Date:
 Disposition Status:
 Effective Date:

 State Filing Description:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
 - POS
Product Name: VT LG HMO 2021 POS Riders
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General Information

Project Name:	Status of Filing in Domicile:
Project Number:	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments:
Explanation for Combination/Other:	Market Type: Group
Submission Type: New Submission	Group Market Size: Large
Group Market Type: Employer	Overall Rate Impact: -3.4%
Filing Status Changed: 03/15/2021	
State Status Changed:	Deemer Date:
Created By: Christopher Pontiff	Submitted By: Christopher Pontiff
Corresponding Filing Tracking Number:	

PPACA: Non-Grandfathered Immed Mkt Reforms

PPACA Notes: null

Include Exchange Intentions: No

Filing Description:

The proposed manual rates included within this filing are for employer groups with 100+ employees in the state of Vermont with coverage dates beginning between 7/1/2021 - 12/31/2021.

Company and Contact

Filing Contact Information

Matt Lombardo,	mlombardo@mvphealthcare.com
625 State Street	518-388-2483 [Phone]
Schenectady, NY 12305	

Filing Company Information

MVP Health Plan, Inc.	CoCode: 95521	State of Domicile: New York
625 State Street	Group Code: 1198	Company Type: Health
Schenectady, NY 12305	Group Name:	Maintenance Organization
(518) 388-2469 ext. [Phone]	FEIN Number: 14-1640868	State ID Number:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
- POS
Product Name: VT LG HMO 2021 POS Riders
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Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State: VermontGMCB

Filing Company: MVP Health Plan, Inc.

TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS

Product Name: VT LG HMO 2021 POS Riders

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Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Response	Jacqueline Lee	03/11/2021	03/11/2021
Pending Response	Jacqueline Lee	02/23/2021	02/23/2021

Response Letters

Responded By	Created On	Date Submitted
Christopher Pontiff	03/15/2021	03/15/2021
Christopher Pontiff	02/26/2021	02/26/2021

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
- POS
Product Name: VT LG HMO 2021 POS Riders
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Objection Letter

Objection Letter Status	Pending Response
Objection Letter Date	03/11/2021
Submitted Date	03/11/2021
Respond By Date	03/17/2021

Dear Matt Lombardo,

Introduction:

Please see the attached letter.

Conclusion:

Sincerely,
Jacqueline Lee



March 11, 2021

Matt Lombardo
MVP Health Insurance Company
625 State Street
Schenectady, NY 12305

Re: MVP Health Plan, Inc.
Company NAIC # 95521; FEIN # 14-1640868
2021 Large Group POS Rider Rate Filing
SERFF Tracking # MVPH-132718695

Dear Mr. Lombardo:

Lewis & Ellis, Inc (L&E) has been retained by the Green Mountain Care Board ("GMCB") to review the above referenced Large Group product filing submitted on 02/12/2021. Upon review of the actuarial memorandum and related information submitted, the following additional information is needed:

1. Regarding the response to question #2 of the previous objection letter – this is not enough information to gauge the reasonableness of the rider premium loads provided. Please provide a quantitative summary of the base data used and a calculation of the premium loads including adjustments applied. Support should be in Excel format with working formulas.
2. Please provide the historically observed loss ratio for the riders in total for VT. We acknowledge that this block of business is not credible, however we are still requesting this data.
3. Please provide the historically observe loss ratio for the riders in total for NY, which was the basis for developing the VT rider premium loads. Additionally, please discuss any differences between the historically observed loss ratio of this block of business and the loss ratio targeted in the development of the rider premium loads.

Please respond as soon as possible, but no later than March 17, 2021.

Our review of filing will be placed in suspense pending your response. Contact me if you have any questions.

Sincerely,



Traci Hughes, ASA, MAAA
Consulting Actuary



LEWIS & ELLIS, INC. – ACTUARIES AND CONSULTANTS

700 South Central Expy, Ste 550, Allen, TX 75013

1-972-850-0850 thughes@lewisellis.com

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
- POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Objection Letter

Objection Letter Status	Pending Response
Objection Letter Date	02/23/2021
Submitted Date	02/23/2021
Respond By Date	03/02/2021

Dear Matt Lombardo,

Introduction:

Please see the attached letter.

Conclusion:

Sincerely,
Jacqueline Lee



LEWIS & ELLIS

Actuaries and Consultants

700 Central Expressway South
Suite 550
Allen, TX 75013

972-850-0850
lewisellis.com

February 23, 2021

Matt Lombardo
MVP Health Insurance Company
625 State Street
Schenectady, NY 12305

Re: MVP Health Plan, Inc.
Company NAIC # 95521; FEIN # 14-1640868
2021 Large Group POS Rider Rate Filing
SERFF Tracking # MVPH-132718695

Dear Mr. Lombardo:

Lewis & Ellis, Inc (L&E) has been retained by the Green Mountain Care Board ("GMCB") to review the above referenced Large Group product filing submitted on 02/12/2021. Upon review of the actuarial memorandum and related information submitted, the following additional information is needed:

1. Please provide quantitative support for the development of the average rate change of -3.4%. Support should be in Excel format with working formulas.
2. Please provide further quantitative and qualitative support for the development of the additional percentage of premium for the POS riders (i.e. what base data was used, what trend assumptions were used, what adjustments were made, etc.).

Please respond as soon as possible, but no later than March 2, 2021.

Our review of filing will be placed in suspense pending your response. Contact me if you have any questions.

Sincerely,

Traci Hughes, ASA, MAAA
Consulting Actuary



LEWIS & ELLIS, INC. – ACTUARIES AND CONSULTANTS

700 South Central Expy, Ste 550, Allen, TX 75013
1-972-850-0850 thughes@lewisellis.com

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 03/15/2021
Submitted Date 03/15/2021

Dear Thomas Crompton,

Introduction:

Response 1

Comments:

Please see the attached for the response to L&E Objection letter #2.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 2
Comments:	
Attachment(s):	Response to 2021 VT LG POS Objection #2.pdf Support for Objection 2 SERFF.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

Christopher Pontiff

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 02/26/2021
Submitted Date 02/26/2021

Dear Thomas Crompton,

Introduction:

Response 1

Comments:

Please see the attached for the response to L&E Objection letter #1.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 1
Comments:	
Attachment(s):	Support for Objection 1.xlsx Response to 2021 VT LG POS Objection #1.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

*Sincerely,
Christopher Pontiff*

State: VermontGMCB Filing Company: MVP Health Plan, Inc.
 TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
 - POS
 Product Name: VT LG HMO 2021 POS Riders
 Project Name/Number: /

Post Submission Update Request Processed On 02/23/2021

Status: Allowed
 Created By: Christopher Pontiff
 Processed By: Thomas Crompton
 Comments: This post submission update is allowed to change 6 group to 1 group, and 6 covered lives for the riders attached to the large group filing.

Company Rate Information:

Company Name:MVP Health Plan, Inc.

Field Name	Requested Change	Prior Value
Number of Policy Holders Affected for this Program	1	6
Product:	NEW	
Product Name	Preferred Suite HD POS	
Number of Covered Lives	6	
Product:	NEW	
Product Name	Preferred Suite POS	
Number of Covered Lives	1	

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Decrease
Overall Percentage of Last Rate Revision: 0.000%
Effective Date of Last Rate Revision:
Filing Method of Last Filing:
SERFF Tracking Number of Last Filing:

Company Rate Information

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
MVP Health Plan, Inc.	Decrease	-3.400%	-3.400%	\$-17	1	\$487	-3.400%	-3.400%

State: VermontGMCB Filing Company: MVP Health Plan, Inc.
 TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only
 - POS
 Product Name: VT LG HMO 2021 POS Riders
 Project Name/Number: /

Rate Review Detail

COMPANY:

Company Name: MVP Health Plan, Inc.
 HHS Issuer Id: 92082

PRODUCTS:

Product Name	HIOS Product ID	HIOS Submission ID	Number of Covered Lives
Preferred Suite HD POS			6
Preferred Suite POS			1

Trend Factors:

FORMS:

New Policy Forms: VT POS COC
 Affected Forms:
 Other Affected Forms:

REQUESTED RATE CHANGE INFORMATION:

Change Period: Semi-annual
 Member Months: 126
 Benefit Change: None
 Percent Change Requested: Min: -3.4 Max: -3.4 Avg: -3.4

PRIOR RATE:

Total Earned Premium: 503.57
 Total Incurred Claims: 0.00
 Annual \$: Min: 13.99 Max: 13.99 Avg: 13.99

REQUESTED RATE:

Projected Earned Premium: 486.66
 Projected Incurred Claims: 0.00
 Annual \$: Min: 13.52 Max: 13.52 Avg: 13.52

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State: VermontGMCB **Filing Company:** MVP Health Plan, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS
Product Name: VT LG HMO 2021 POS Riders
Project Name/Number: /

Supporting Document Schedules

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	2021 ACT MEMO HMO Large Group.pdf VT LG HMO POS 2021 Rate Filing SERFF.pdf VT LG HMO POS 2021 Rate Filing SERFF.xlsx
Item Status:	
Status Date:	
Bypassed - Item:	Actuarial Memorandum and Certifications
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Civil Union Rating Requirements
Comments:	MVP's forms satisfy 8 V.S.A. § 4724.
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Consumer Disclosure Form
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Filing Compliance Certification
Comments:	
Attachment(s):	Certification of Compliance - VT.pdf
Item Status:	
Status Date:	
Bypassed - Item:	Third Party Filing Authorization
Bypass Reason:	N/A
Attachment(s):	

SERFF Tracking #:

MVPH-132718695

State Tracking #:**Company Tracking #:****State:**

VermontGMCB

Filing Company:

MVP Health Plan, Inc.

TOI/Sub-TOI:

HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS

Product Name:

VT LG HMO 2021 POS Riders

Project Name/Number:

/

Item Status:	
Status Date:	

Bypassed - Item:	Unified Rate Review Template
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Objection 1
Comments:	
Attachment(s):	Support for Objection 1.xlsx Response to 2021 VT LG POS Objection #1.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Objection 2
Comments:	
Attachment(s):	Response to 2021 VT LG POS Objection #2.pdf Support for Objection 2 SERFF.xlsx
Item Status:	
Status Date:	

SERFF Tracking #:

MVPH-132718695

State Tracking #:

Company Tracking #:

State:

VermontGMCB

Filing Company:

MVP Health Plan, Inc.

TOI/Sub-TOI:

HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.003B Large Group Only - POS

Product Name:

VT LG HMO 2021 POS Riders

Project Name/Number:

/

Attachment VT LG HMO POS 2021 Rate Filing SERFF.xlsx is not a PDF document and cannot be reproduced here.

Attachment Support for Objection 1.xlsx is not a PDF document and cannot be reproduced here.

Attachment Support for Objection 2 SERFF.xlsx is not a PDF document and cannot be reproduced here.



ACTUARIAL MEMORANDUM
2021 Large Group MVPHP Manual Rate Filing

Purpose of Filing

The purpose of this filing is to demonstrate the development of manual rates in support of MVP Health Plan's (MVPHP) Large Group POS rider portfolio and seek approval of the manual rates used to develop group specific premium rates. The premium rates included in this filing are for group effective dates between 7/1/2021 and 12/31/2021. The rates are effective for 6 months. This rate filing has been prepared to satisfy the requirements of 8 V.S.A § 5104 and is not intended to be used for other purposes.

MVP is proposing these point of service (POS) riders to provide out-of-network (OON) coverage as a supplement to the in-network (INN) coverage. The in-network plans can be found in SERFF filing number MVPH-132497714.

Scope of Filing

As of January 2021, there are 6 members enrolled in MVPHP's large group block of business with OON coverage (via combined HMO/HDHMO products).

All the riders in this filing are a percentage of the manual rate. MVP is not proposing to change any of the manual rates in this filing.

Actuarial Certification

I, Chris Pontiff, am an Associate of the Society of Actuaries. I have examined the assumptions and methods used in determining MVP's requested rates. Based on my review and examination, it is my opinion that the proposed premium rates are reasonable in relation to the benefits provided and that they are not excessive, inadequate, nor unfairly discriminatory. This rate filing conforms to the applicable Standards of Practice as promulgated by the Actuarial Standards Board.

A handwritten signature in black ink, appearing to read "Chris Pontiff", with a stylized flourish at the end.

Chris Pontiff, ASA
Leader, Actuarial
MVP Health Care

02/12/2021
Date



MVP Health Care -- 2021 LG POS MVPHP Rate Filing

Large Group VT POS MVPHP Rate Filing
For Effective Dates Beginning Between July 1, 2021 - December 31, 2021

Exhibit 1 -- Medical Rider Rates

Exhibit 1 -- Medical Riders

Large Group VT POS MVPHP Rate Filing
 For Effective Dates Beginning Between July 1, 2021 - December 31, 2021

HMO Rider	Description	Product Type	Net Required Revenue	Quarterly Change	Annual Manual Rate Change
SV3HMB101L	\$1,000 Deductible / 40% Coinsurance / \$6,650 OOP Max	POS	3.6%	0.0%	0.0%
SV3HMB102L	\$2,000 Deductible / 40% Coinsurance / \$6,650 OOP Max	POS	3.3%	0.0%	0.0%
SV3HMH102L	\$2,000 Deductible / 40% Coinsurance / \$6,650 OOP Max	POS	3.3%	0.0%	0.0%
SV3HMB103L	\$4,000 Deductible / 40% Coinsurance / \$8,000 OOP Max	POS	2.8%	0.0%	0.0%
SV3HMH103L	\$4,000 Deductible / 40% Coinsurance / \$8,000 OOP Max	POS	2.8%	0.0%	0.0%
SV3HMB104L	\$6,500 Deductible / 40% Coinsurance / \$13,000 OOP Max	POS	2.0%	0.0%	0.0%
SV3HMH104L	\$6,500 Deductible / 40% Coinsurance / \$13,000 OOP Max	POS	2.0%	0.0%	0.0%
SV3HMB105L	\$8,000 Deductible / 40% Coinsurance / \$16,000 OOP Max	POS	1.6%	0.0%	0.0%
SV3HMH105L	\$8,000 Deductible / 40% Coinsurance / \$16,000 OOP Max	POS	1.6%	0.0%	0.0%

Certification of Compliance

I hereby certify that I have reviewed the applicable filing requirements for this filing and the filing complies with all applicable statutory and regulatory provisions for the state of Vermont.

Print Name: Karla Austen **Title:** Chief Financial Officer & Executive Vice President

Signature:

A handwritten signature in black ink, appearing to read 'K. Austen', written over a horizontal line.

Date: 02/12/2021



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphealthcare.com

February 26, 2021

Ms. Traci Hughes, ASA, MAAA
Lewis & Ellis, Inc.
700 Central Expressway South, Suite 550
Allen, TX 75013

Re: : MVP Health Plan, Inc.
Company NAIC # 95521; FEIN # 14-1640868
2021 Large Group POS Rider Rate Filing
SERFF Tracking # MVPH-132718695

Dear Ms. Hughes:

This letter is in response to your correspondence received 02/23/21 regarding the above-mentioned rate filing. The responses to your questions are provided below.

1. Please provide quantitative support for the development of the average rate change of -3.4%. Support should be in Excel format with working formulas.

Response: Please see the attached excel document that shows the development of the -3.4% rate change.

2. Please provide further quantitative and qualitative support for the development of the additional percentage of premium for the POS riders (i.e. what base data was used, what trend assumptions were used, what adjustments were made, etc.).

Response: MVP does not have a credible block in VT with OON benefits. As a result, MVP used its NY LG OON block of over 17,000 members to determine the average OON utilization as a percentage of INN utilization and compute the average OON load. MVP then used its benefit relativity model to determine the relativity of OON benefits to one another normalized back to the OON % utilization in the NY block.

If you have any questions or require any additional information, please contact me at cpontiff@mvphealthcare.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Pontiff".

Chris Pontiff, ASA
Leader, Actuarial, Commercial
MVP Health Care



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphhealthcare.com

March 15, 2021

Ms. Traci Hughes, ASA, MAAA
Lewis & Ellis, Inc.
700 Central Expressway South, Suite 550
Allen, TX 75013

Re: MVP Health Plan, Inc.
Company NAIC # 95521; FEIN # 14-1640868
2021 Large Group POS Rider Rate Filing
SERFF Tracking # MVPH-132718695

Dear Ms. Hughes:

This letter is in response to your correspondence received 03/11/21 regarding the above-mentioned rate filing. The responses to your questions are provided below.

1. Regarding the response to question #2 of the previous objection letter – this is not enough information to gauge the reasonableness of the rider premium loads provided. Please provide a quantitative summary of the base data used and a calculation of the premium loads including adjustments applied. Support should be in Excel format with working formulas.

Response: Please see the attached excel document which shows the 2018 and 2019 MLRs of the rider premium loads for our New York PPO block which is the basis of the rider load derivation. MVP realized a 91.2% loss ratio in 2018 and a 71.6% loss ratio in 2019 for a two-year average loss ratio of 80.4%; the target loss ratio was 82.9% in 2018 and 83.9% in 2019. Based on an analysis from MVP's informatics team, out of network claims were 1.8 times more expensive than the same claim performed with an in-network provider.

Out of network claims are traditionally more severe and therefore create a wider range of potential outcomes. Due to the volatility in OON claims from year-to-year, MVP did not modify the rider loads being charged for 2021 based on the loss ratios observed in 2018/2019 relative to expectations.

2. Please provide the historically observed loss ratio for the riders in total for VT. We acknowledge that this block of business is not credible, however we are still requesting this data.

Response: MVP has had a loss ratio of 0% for these riders over the past 3 years. The annual premium MVP receives for these riders is ~\$1000 and one out of network claim incurred will likely create a loss ratio that is exceptionally high due to this block having 6 members as of the time of this filing.

3. Please provide the historically observed loss ratio for the riders in total for NY, which was the basis for developing the VT rider premium loads. Additionally, please discuss any differences between the historically observed loss ratio of this block of business and the loss ratio targeted in the development of the rider premium loads.

Response: Please see the response to Question #1.



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphealthcare.com

If you have any questions or require any additional information, please contact me at cpontiff@mvphealthcare.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Pontiff".

Chris Pontiff, ASA
Leader, Actuarial, Commercial
MVP Health Care